

Commonwealth of Kentucky
Division for Air Quality
RESPONSE TO COMMENTS

TITLE V (RENEWAL) NO. V-05-064

FOME-COR COMPANY, LLC

GLASGOW, KY

JULY 18, 2006

COMPLETED BY: KENVIRONS, INCORPORATED

REVIEWER: JULIAN BRECKENRIDGE

SOURCE I.D. # 21-009-00060

SOURCE A.I. # 77

ACTIVITY # APE20050002, APE20050003, APE20060001

SOURCE DESCRIPTION:

Fome-Cor Company, LLC has applied to the Kentucky Division for Air Quality for a permit to operate a laminated foam board products manufacturing facility. Their most recent application was received on May 12, 2006 and completed on June 14, 2006. It was a minor revision dealing with an addition of a new resin impregnated paper product in the laminator process.

PUBLIC AND U.S. EPA REVIEW:

On May 24, 2006 the availability of public notice on the draft permit was published in the *Daily Times* in Glasgow, Kentucky. The public comment period expired 30 days from the date of publication.

Comment received:

Comments were received from Fome-Cor Company, LLC. Attachment A to this document lists the comments received and the Division's response to each comment. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed. Please see Attachment A for a detailed explanation of the changes made to the permit. The U.S. EPA has 45 days to comment on this proposed permit.

ATTACHMENT A

Response to Comments

Comments: on Draft Title V Air Quality Permit submitted by Paul Huzyak, Plant Manager for Fome-Cor Company, LLC. Responses by the Kentucky Division for Air Quality are included after each comment.

Title V Permit:

1. On page 4, typographical correction. Section B – Emission Points, Emission Units, Applicable Regulations, and Operating Conditions, the emission unit description for point 0AC reads, “Laminator: Die/Cold Rolls, Heating Extruders, Cooling Extruders, Gauge Expansion, Adhesive Glue Roll Coater.” The presence of the colon after Laminator implies that the subsequent equipment is a part of the laminator, which is not the case. We request the colon be replaced with a comma to read: “Laminator, Die/Cold rolls, Heating Extruders, Cooling Extruders, Gauge Expansion, Adhesive Glue Roll Coater.”

Division’s response: The Division has revised the permit as requested by the source.

2. On page 7 Section B – Emission Points, Emission Units, Applicable Regulations, and Operating Conditions, the emission point 0AE (E7) Warehouse (product Storage and Shipping Area) is listed as having a maximum rated capacity of 74 tons VOC per year. This maximum is not accurate. We estimate that approximately 50% of total annual VOC emissions occur at this point as a result of aging and curing; no manufacturing process takes place at this emission point. We request that this maximum capacity for warehouse storage fugitive emissions be removed, since our annual emissions inventory contains the full emission amount.

Division’s response: The Division has revised the permit as requested by the source.

3. Page 5, Section B – Emission Points, Emission Units, Applicable Regulations, and Operating Conditions, Emission Units: 0AA, 0AB, 0AC, and 0AD – Material Handling and Processing, point (d) under Emission Limitations and Page 10, Section D – Source Emission Limitations and Testing Requirements, point 5 state the following:

Pursuant to 401 KAR 63:020, persons responsible for a source from which hazardous matter or toxic substances may be emitted shall provide the utmost care and consideration, in the handling of these materials, to the potentially harmful effects of the emissions resulting from such activities. No owner or operator shall allow any affected facility to emit potentially hazardous matter or toxic substances in such quantities or duration as to be harmful to the health and welfare of humans, animals and plants. Evaluation of such facilities as to adequacy of controls and/or procedures and emission potential will be made on an individual basis by the cabinet.

Compliance Demonstration Method:

In order to show compliance with 401 KAR 63:020, if units are added or modified, the source may be required to conduct dispersion modeling to demonstrate potential emissions of gaseous ammonia, vinyl acetate, and styrene do not exceed the reference concentrations (RfC). The concentration of each pollutant in the ambient air, open to the public, shall be below the carcinogenic risk of 1 in a million, or below the RfC for non-carcinogens (as listed in the EPA Integrated Risk Information System (IRIS)).

We request that the requirement for compliance demonstration be deleted as neither the methodology nor the risk values have been adopted as valid Kentucky regulations. We request that the wording for the compliance demonstration method reflect those requirements that have been appropriately adopted into regulations following the administrative procedures specified by statute, KRS 242 and KRS 13, for the adoption of regulations by the cabinet.

Division's response: The Division has revised point 5 of Section D on page 10 to say the following below.

In order to show compliance with 401 KAR 63:020, if units are added or modified, the source may be required to conduct dispersion modeling to demonstrate potential emissions of gaseous ammonia, vinyl acetate, and styrene do not exceed the reference concentrations (RfC).

MINOR REVISION:

A minor revision application was received at the Division for Air Quality on May 12, 2006. The revision dealt with an addition of a new resin impregnated paper product in the laminator process (KY EIS #E5.1A-E5.1D of Emission Unit 0AC). The resin on the paper contains less than 0.1% by weight formaldehyde, thus creating the potential for hazardous air pollutant emissions during its lamination process. After formulating the data the Division has come to the conclusion that the maximum potential emissions of formaldehyde were low enough to not result in a significant emissions increase and to not violate applicable requirements of a Title V permit. No changes were made to the draft permit V-05-064 for this revision, but the Statement of Basis and emissions inventory system were updated.